

EXHIBIT “A”

**CYNTHIA CLEMETSON, HUMAN RESOURCES GENERALIST,
DENTON COUNTY**

**RACE DISCRIMINATION/WORKPLACE
HARRASSMENT/HOSTILE WORK ENVIRONMENT AND
RETALIATION COMPLAINT, AT THE HANDS OF AMY
PHILLIPS, DIRECTOR OF HUMAN RESOURCES, DENTON
COUNTY**

CLAIM:

Workplace Harassment

Race discrimination

Creating a Hostile Work Environment

Investigation Interference by compromising its objectivity

Retaliation

Family Medical Leave harassment and **retaliation**

Named:

Amy Phillips – Human Resources Director

Gustavo Hernandez – Assistant Human Resources Director

Vickie (Michelle) Brewer – Project Manager

Lisa Uhlich – Civil Service Coordinator

Harry Green – Former Civil Service Coordinator

Cassandra (Cassie) Morgan – Administrative Manager

Susan Burchett – Administrative Specialist II

Melody Graham - Administrative Specialist III

Leslie Ripple - Administrative Specialist II

Dr. Chad – My Chiropractor

Commissioner Hugh Coleman – Commissioner Precinct #1

Attorney John Hagan – told me to talk with Commissioner Coleman

Saul Moore – Former Employee

Robert Musgrove – Current employee - Stormwater Manager

Sandi Wiggins – Current employee - Assistant Bioterrorism Coordinator

Vanessa Sims - Former Economic Development Director

Nadiya Boldware -Williams – Current Attorney in DA's office

Cassandra Berry – Job applicant

Frances Knott – Former Chief District Clerk (part of Adam Thompson's investigation)

Adam Thompson – Deputy Clerk in District Clerk's office

Shayla Moore – Job Applicant unknowingly discriminated against

Sherri Rather – Job Applicant unknowingly discriminated against

Last year I met with someone at the EEOC office in Downtown Dallas to go over several instances of Discrimination that took place in my office. I had lengthy documentation and was prepared to file a complaint. Unfortunately, after talking with someone there, careful consideration and much prayer along with the fact that most all of the discriminating instances, were either in the presence of a co-worker that no longer worked there and would not tell the truth about Director, Amy Phillips even if they were still there, or were made to me by the Director without any witnesses. In addition to the above factors, I was also very concerned about my safety after filing the complaint, as I heard of threats made to another black employee that recently won a discrimination lawsuit against the county. Since that time, I have kept detailed notes hoping to have relevant documentation and possible witnesses, in case the behavior of my Director worsened, as proof of all of my statements.

On or about 05/23/2011, 6/22/2011 and 11/07/2012 - Workplace Harassment – Amy told me that she dated a guy that was very athletic. She went on to share other details of their relationship, such as going to a bar with him and one of her girlfriend and comments made by other patrons of the bar about the three of them. She painted a picture to lead me to believe he was a black man. Eventually she told me that this person was black. She would continue to bring up this person to me to remind me that she dated a black man. Finally one day, she made another highly racist comment to me, by telling me that she was told by a friend that “Black men prefer white women”. I was in shock when she uttered this racist statement to me and told her that it was not only offensive that she would say such an outrageously racist comment to me. I told her that if she was told that, then it was on that friend's opinion definitely not true and that I couldn't believe she would say such a thing. Eventually, Amy told me that this same black man she referred to earlier in this paragraph is now married to a woman that is not black and that he sang a song at her wedding and her husband was ok with it.

It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would result to making a racist comment such as the above one, insulting my race and in an effort to insult black women.

On or about 2/3/2012, 3/12/2012 and 11/06/2013 - Workplace Harassment – Amy has made offensive remarks regarding black parents on at least two occasions – Amy shared with me that she used to be a school teacher working in a low income neighborhood for several years before getting into the Human Resources field. She often told me of how poor the children were and how most of them were illiterate and mostly all black children. She highly offended me when she stated that “the mothers of the children in these neighborhoods do not care about their children’s education”. I told her that maybe the parents work schedules didn’t allow them to make the meetings and that they may be able to meet if there were time accommodations, she continued to tell me that they had no interest in their children’s education and gave me examples of young black boys that were struggling and how their mothers didn’t make the Parent Conference meetings. I told her that I disagreed with her comment and that I thought it was offensive. I told her that those mothers were no different in terms of love for their children that the white affluent parents were in affluent subdivisions. She went on to state that the black mothers did not come to the school to check on their children and therefore did not care about

their children's education. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would result to harassing me about her displeasure with black parents and make such a racist comment about black parents. (SEE MY FULL COMPLAINT FOR DETAILS)**

Workplace Harassment for being on FML – I was in an auto accident in late September. The accident was classified as “T-Bone”. After learning of my accident, the first time Amy came into my office, she made told me that she couldn't believe that I had injuries from the accident because she was in the same type of accident, but walked away with no injuries. It was highly offensive and exhausting having to defend my injuries every time

She felt she wanted an update on my injuries and medical progress. If it wasn't bad enough that she didn't believe my injuries and furthered her harassment by comparing my injuries to hers, just to tell me again that it didn't make sense to her why I got hurt, but she didn't. Amy went further in her harassment after learning that I was seeing a Chiropractor. She constantly offended my by stating that Chiropractors are not real doctors. Her harassing behavior did not cease until after I talked with Commissioner Coleman. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would result to harassing me about my right to use Family Medical Leave. (SEE DETAILS IN MY FULL COMPLAINT).**

On or about week of 08/09/2013, 11/21/2014 - Discrimination through reprimand process – Amy has a double standard when it comes to reprimanding whites in her department vs. black. However, there have been countless major errors done by our front office white employees. One known instance of Michelle Brewer talking extremely loudly and being told that she was rude by Amy. However, that act that both Amy and Gustavo witnessed did not result in a reprimand. Countless mistakes made by Georgiana prior to her retirement that we are still finding and fixing. Yet, Amy told me that she only wrote up Georgiana one time. Furthermore, It is my understanding that three of our white employees were caught using “IM” Instant Messaging, where one of the employees made racist comments about Shaira B and Gustavo H, by stating that they were dumb and that they couldn't speak English and finally that they both need to go back to Mexico. In addition to these examples of a need of reprimands for the white employees, I will mention another gross error made by a white staff member in my department of which there was no reprimand. Susan B, on or about 11/21/2014 stated on an Order Maker/Hire Action that an employee with the last name of “Smith” passed a drug test. As a result the new employee was hired and working on the job, when it was discovered the new hire in fact had failed her drug test and tested positive for using cocaine. As a result of this gross error by Susan, I had to call the department head, Bing Burton and inform him that the employee should have never been hired as a result of the testing. The department was understandably upset that our department made the error and they now had to fire the employee. Gustavo H. was also extremely upset to the point of wanting to fire Susan immediately. However after talking with Amy, Bing had to fire his new employee since what was presented to court was untrue, but Susan did not receive a written reprimand for this gross error to this date. To my knowledge, there is no email chain (public record) and documentation in the folders of neither Georgiana M., Michelle B., Melody G.,

Leslie R. or Casey N., or Susan B, being given reprimands for events that obviously deserve a reprimand. Yet, Amy was quick to give me a reprimand via email, so that it is viewable by the public. (SEE DETAILS IN FULL COMPLAINT DOCUMENT) as a result of a complaint from another employee that was based on complete lies, even after my explaining what really took place and writing a lengthy response. Amy state that I should have responded to the employee by calling her instead of via email, even though she told me that Commissioner Eads was sent a complaint about her from an employee and read off some of the response she says that she sent the Commissioner to defend herself. Also, Amy's reprimand was given to me shortly after a new black was hired into the department, also after being asked if I was looking for another job and more of my job duties being given away. I believe that these efforts of Amy's part were in hopes of me resigning from my job and leaving Amy with still one black employee on her professional staff that she hired to be my replacement. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would discriminate against blacks and not treat us equally when it comes to the reprimand process. Amy's discriminating practice leaves black employees appearing to have permanent negative records and allows white employees in the department to get away with gross acts of racism and misconduct. (SEE DETAILS IN MY FULL COMPLAINT).**

11/13/2012 - Discrimination through hiring practices for hiring more blacks in professional jobs even when they are more qualified than whites – Example: Civil Service position – Amy told me about the interviews she conducted and told me that she was highly interested in a candidate that lived in Rockford Illinois and was hoping that she would be able to hire her if she interviewed well. However, there was a black candidate that applied that Amy also interviewed that lived in Georgia that was just as qualified, if not more than the white candidate. Amy told me that she interviewed very well was very knowledgeable about the law, but that she was concerned that she would want to move from Atlanta. Amy also mentioned that the candidate was married and wondered if her husband planned on working if she got the job. Amy stated that it didn't make sense to her that this woman would uproot and her husband has no job. Amy also told me she wanted to ask the woman what type of job he had, but she knew that she couldn't ask that question. Amy went on to state that "I'm sure that she is black. I can tell when someone is black over the phone" I asked her how could she tell that, and she said that "black people have a certain dialect, and I can always tell when they are black by the way they pronounce certain words". She made every excuse she could think of to eliminate the black candidate from getting the job. In the end, by the time I called the white candidate to set up an interview for Amy, the candidate told me that she had just accepted another job. Amy was disappointed. There have also been a few other blacks that have repeatedly applied to jobs in our department including Sandi Wiggins and Cassandra Berry that are both just as if not more qualified that the ones Amy hired. Amy continues to find excuses not to hire these individuals. She told me that she would go on and interview Cassandra even though she had no interest in hiring her, so that it wouldn't look bad. She still refuses to ever interview Sandi Wiggins for any positions in our department and told me that the white employees in her department would resign if she

ever became their manager. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, continues to discriminate against blacks in the hiring process and ensure that no other black is allowed to be hired into a professional position even if they have the same or more qualifications than white employees, now that she has one black professional. (SEE DETAILS IN MY FULL COMPLAINT).**

3/6/2014 – Most recent occurrence just happened last week. A black applicant with two.

3/6/14 – Most recent occurrence just happened last week. A black applicant (Sherri Rather) with two Masters degrees, over 15 years of combined education and experience that arrive over an hour prior to her interview was looked over to hire a white former Sheriff's office employee (Krystal Amyx) (with less than six years of experience and no degree. I was asked to call her today and tell her that she did not get the job. I can give details and documentation.

Discrimination by not giving our black manager an office and displaying her to the county with no direct reports even though her job description states that she supervises – Cassie Morgan is a black woman and manages two white employees in my department. However, Amy refuses to give her own office. even though from my understanding she is the only Administrative Manager in the entire county that does not have her own office, with the exception of maybe an office where offices are limited. We now have two empty offices and Amy still refuses to give Cassie one. Instead she made one of the offices into a typing room again and is leaving the other one empty. Also, if you look at the employee directory, our department is the only one in the entire county that shows that both of the Administrative Specialist II's report to Michelle (Project Manager), rather than the administrative Manager, which is Cassie. In every other department across the county, all Administrative Specialist report to an Administrative Manager, when that positions exists without exception. In addition, Cassie's job description states that she supervises. But, Amy has requested that the employee directory that is visible by all county employees shows that Cassie does not supervise anyone, even though it's her job to do so. Amy refuses to let the rest of the county see the Specialists reporting to a black manager in our department. As a result, the Specialists appear to not respect Cassie as their manager, since it's clear that they don't report to her. Melody Graham, who is a white Administrative Specialist III has a lower pay grade than Cassie and does not have supervision responsibilities in her job duties, yet it is my understanding that she has had her own office since she has been in the position. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would result to discriminating against another black in our department by not giving her the same equal treatment that all the white Administrative Managers around the county have the right to. (SEE DETAILS IN MY FULL COMPLAINT).**

04/01/2013 – (Time off request) I Sent Gustavo Hernandez, the Assistant Director of Human Resources, my vacation request for year end holiday time off. Gustavo replied that he wanted to wait until later in the year to approve vacation. I told him that I wanted to make travel plans with my family. Gustavo did not approve my vacation request until four months later, after several email exchanges and him telling me that he didn't "have to approve any vacation all year if he didn't want" to, I felt that what he was doing was extremely unfair. He left me to have to go the other professionals and see what their plans were before he would approve my time off request. Their minds were no where on Christmas at that time of year and they couldn't say what their plans would be. Gustavo expected me to wait until they made plans before he would approve my request for five days off. (Email documentation can be provided if needed)

08/26/2013 thru 08/30/2013 – Sometime during this week, Amy Phillips, the Director of Human Resources, told me that she was going to be posting the new "Administrative Manager" position in our office as it was approved in Commissioners Court for her to get the new slot. She also told me that she will be moving our Benefits personnel out of our office and into a different area on the same floor. She told me that the office that Melody Graham, Administrative Specialist III, now resides in will be the new Administrative Manager's office. During that same week and before actually posting the job, Amy came into my office and appeared to be very nervous. Finally she said "I just want to know, are you looking for another job?" I was in shock, as I have shown no signs of looking for another job, had not missed any work days or indicated in any way that I was interested in leaving. I responded "No, I am not, where did that come from? Why would you ask me that"? She then said, I was just wondering and then left my office. I thought it was really strange of any manager to ask that question of any employee. I wrestled with the thought of my manager asking me such an improper question. I also struggled to sleep that night, as I tried to determine her motivation. That same week after asking me the question, I was in her office with Gustavo Hernandez, the Assistant Director of Human Resources and we were talking about a posting, when out of no where Amy looked at me, but was talking to Gustavo and said "I expect my professional employees to give me a month notice before they leave". Gustavo, sort of laughed it off, as he didn't even think she was serious, then she restated the same statement and added "I'm serious", all the time looking at me, as if she was waiting for my response. I felt threatened, as she stared at me with an intimidating look. Her actions were even more puzzling, as I also thought about the comment. Her actions were even more puzzling, as I also thought about the comment she had made earlier that same week. I assume that her statement was intended for me. Based on the past comment, I assumed she was addressing me. I did not respond and left the office. I was so distraught, that I immediately left the department.

08/30/2013 – One of my main job functions is to screen all applications for all positions, with the exception of Sheriff Office postings. On this day, Amy came into my office and told me that she just wanted me to know that she wants the new Administrative Manager to screen Administrative applications. I thought this was extremely strange, as Amy has very adamantly told us that she does not want any non professional positions to screen applications, because it was a professional job duty, she also stated that the non professionals did not get paid enough, nor have the skill set to review applications. She

even stopped one of our Administrative Specialists (Susan Burchett) that had been screening applications for years from doing so, once she found out. I wondered why Amy was so determined to eventually **take another one of my job responsibilities away, by making me share the responsibilities with yet another co-worker**, but I knew it would be a waste of time asking why. So, I replied “ok”. Amy looked at me with a look, as if to unsettle me. But, I realized where this action was going.

09/03/2013 thru 09/05/2013 – Amy came into my office and asked me if Cassandra (Cassie) Morgan, a current employee, had applied to our Administrative Manager posting yet? I told Amy that I was not sure, but I would look it up and let her know. She also asked me if I knew Cassie, I told her that I did not. She then said “**She is Golden**”. I didn’t know where she came up with that comment, as I didn’t know of them having a relationship for Amy to describe her character that way. However, I don’t know who all Amy has relationships with, it just sounded unusual that she would make the comment to me. I was aware that Cassie was a black woman that worked as an Administrative Assistant. Later that morning, I called Amy and told her that she had not applied yet. Amy told me to let her know when Cassie’s application was in. Cassie applied on **09/05/2013**. I called Amy and let her know. At that point, it became very clear to me why she removed one of my job responsibilities, asked me if I was looking for another job and stated that she expected a one month notice from her professional staff. At this point, I immediately understood her pre-meditated motive and intent. It was apparent that Amy seemed to be hiring Cassie, in hopes of me leaving and it being easy to fill the position and be able to still leave one black employee in the department. Meanwhile, I felt that Amy hoped I would get so intimidated that I would end up resigning. Cassie was hired on **10/21/2013**, as our Administrative Manager and we were told by Amy that we must let her take the typing test however many times it took until she passed. Note: applicants cannot be hired if the job requires a typing test and they cannot pass it. **Amy set the typing score higher than we have on any of our department postings**. But, once she found out that Cassie was having extreme difficulty passing the typing test, she told the front office staff, myself and Michelle to let her take the test as many times as she needed to, until she passed. Amy was also aware that Cassie was previously an executive secretary and it turns out that she also has a high typing speed, but Cassie told me that she was very nervous while taking the test. Very few applicants normally have a typing speed high enough to meet a 45 w.p.m. typing requirement, but Cassie did. Though she had to take the test multiple times on two occasions (two days) before passing in order to achieve the preset high typing score, set by Amy, she finally passed on the second day after a few more tries. Amy was relieved, came to me and said “I told you and Michelle that she would pass, I don’t know why you were worried, I wasn’t worried at all”. **Note:** we have never, as long as I can remember told a candidate that they could take the typing test as many times as they needed and let them come back a second day and continue taking the same test, until the reached the minimum score. It was clear that Amy was determined to hire who she had selected to be my replacement, no matter what it took.

Cassie Morgan is a black woman and was subsequently hired as our Administrative Manager. Ironically, she has come to me quite a few times since she has been in her position with concerns that the employees that are supposed to report to her do not respect her, as if she is not their manager. However, it should be clear that the Administrative Specialists report to Cassie, based on her title. She told me that Michelle Brewer, Project Manager, told her that Amy doesn't want them to report to her yet. I told her that, her job description as a manager over them clearly shows that they report to her (**See attachment #3**) and that I don't know why Amy and Michelle would change the process for our department when every other department in the entire county's organizational chart clearly shows that the Administrative Specialists report to the Administrative Manager. (**Please see Employee Directory Attachment #4**) Cassie was highly confused as to what was going on and left my office distraught and wondering why Amy and Michelle were doing this to her. I told her that I would look into it. After researching the county directory, I discovered that in every department where Cassie's position exists, the Administrative Specialists, without exception, report to the Administrative Manager. However, I was stunned to see that Amy had deviated from the rest of the entire county and has set our department up to have the Administrative Specialists positions bypass Cassie's position and report directly above her to Michelle Brewer, the Project Manager. This is a clear indication that Amy has no intention on having the white Administrative Specialists reporting to a black woman and it is publicized for the entire county to see, unbeknownst to both Cassie and I, until I looked at the employee directory. I clearly understood the damaging effects of Amy's actions, when Cassie told me that because the Specialist know that they don't report to her, they disrespect her and go above her as if she doesn't even exist in the manager role! In addition to this, Cassie also told me that our two Benefits resources have moved out of their offices and that she asked Michelle, when she can move into her office, now that we have two empty offices in the department. She told me that Michelle told her that **they decided that they want her to stay where she was** so that she could watch over the Administrative Specialists work. Again, Cassie told me that she doesn't understand why they are treating her like this as it is not what she signed up for when accepting the position, but that she is too afraid to say anything since she is still on probation.

09/11/2013 - On multiple occasions, Melody forwards emails to me from other departments and so do other co-workers, as I also forward emails to my co-workers from other departments if it relates to their job responsibilities. However, on this particular day, Melody copied Gustavo on the email, which was not necessary and had not happened in the past, unless he has been blind copied without my knowledge. By this time, I am feeling more and more like Gustavo is aiding in harassing me along with Amy and assisting in causing a hostile work environment. Gustavo is already being copied on all emails coming to me from Payroll (see attach below comments) (9/11/2013 emails can be provided if proof is needed). Gustavo now wants to be copied on emails within my own department from one of my own co-workers (Melody). If I had not questioned her about it, it would still be going on. I know that there is no other employee in my department that is being subjected to this treatment. When I asked Melody "Is there a reason why Gustavo is being copied on all of the emails that you send me now"? "Is there a problem I don't know about?" She sends me a very strange response. Melody writes:

“No, not that I am aware of. For me it’s all about CYA”. I was lost for words and I knew that this was Gustavo’s idea, seeing that he and Melody are very good friends and he had to tell her to do this. At 2:42 p.m., I responded with “???????s”, as her email response was not making any sense to me. I knew by this time that Gustavo was trying to cover up his request to be copied and appeared to have told Melody to get out of by apologizing, so that I wouldn’t complain. At 2:56, Melody sends me an email saying that after speaking with Gustavo, she wanted to apologize for being so blunt and then tried to blame the fact that she overhears that I am so busy, that she wanted to make sure that the email does not go unanswered. Note: Gustavo is already being copied on all FML emails sent to me from the payroll department. When I asked him why did he request to be copied on FML emails from Payroll and told him that I feel like I am not being trusted like the other employees are? He told me that it was just temporary so that he could watch what was transpiring on FML, to ensure that nothing was missed. I asked him has he asked to be copied on emails going to the other professionals in the departments. He then said that he was just concerned about FML and that he would also be copied on Lisa’s FML emails, so it’s not just you and then stated that he didn’t ask to be copied, but that Cindy in payroll is the one that suggested it. That made no sense to me, seeing that Cindy is not being copied on the emails, but Gustavo is. At the end of the day, Gustavo is not treating me the same as the other employees. Why would the one requesting the copying of an email, not include herself? This has been going on for several months now, but Gustavo’s only justification is that it’s only temporary.

9/20/2013 – I attended a Symposium at the Holiday Inn, in Denton Texas, at the request of the Assistant Director, Gustavo Hernandez, along with co-workers Michelle Brewer and Jon Nelsen. **The main topic of the symposium was “Workplace Harassment”.** The last speaker was Attorney John Hagan” He was introduced as one of the top lawyers in Dallas. After his speech I had a burning question for him, but did not want my co-workers to see me talking to him. So, once I had the opportunity to talk to Attorney Hagan without Michelle and John watching, I did approach him and asked him the question, what do you do when you are in the very department (Human Resources) that should be enforcing the NON Harassment policy and making sure that the departments are not violating the law. But, happened to be in a position that your own Director was harassing you? He asked me where I worked. I told him that I worked in local government, trying to not disclose exactly where. I think that because the symposium was held in Denton County, he assumed it was where I worked and told me that you need to talk to my good friend “Hugh Coleman”. “He is an attorney and he would not put up with discrimination in the county if he was aware of it”. As soon as he said the name, I was in shock. Not only did he easily figure out where I worked, but he also knew Commissioner Coleman. **(See attachments #1a and b - business card and notes taken from symposium).** He then gave me his business card and told me to call him I needed him, but to go and talk to Commissioner Coleman as he would get to the bottom of any harassment going on. As I left I knew that there was really no way out of not talking to the Commissioners about what has been going on in the department, as I assumed that Attorney Hagan was going to share with Commissioner Coleman that he spoke with me and that I might be filing a complaint.

9/21/2013, one day later, I was in a serious car accident and was left with injuries that I still suffer from. Though the discrimination issue was heavily on my mind and I was soon going to be calling Commissioner Coleman, I now had to focus on doctor visits, medication, and healing from the accident. Therefore, the complaint momentarily had to take a back seat.

9/25/2013 – My first Dr's appointment with my Chiropractor, Dr. Chad. I told him the type of work that I did and that I had a highly stressful job. I also told him that I worked in Human Resources, but that I was subjected to unnecessary added stress on a constant basis. I shared that there were management issues and a lot of unfair treatment going on that made my days agonizing at times and that the environment had become very hard to work in, but that I had to continue working. I have been meeting with Dr. Chad three times per week up to now. Throughout my treatment Dr. Chad has become very familiar with the toll that the stress of my job has been taking on my body and the fact that it was delaying the healing process. He told me that I must get more rest and find a way to remove the stress of my management from my environment or that he would need to take me off work. He told me that he would take me off at anytime if it became overwhelming. I told him that I have been enduring it for years now and that I would agree that the unnecessary stress was causing major physical and emotional damage as I was losing a lot of sleep. He wrote me an excuse to take me off work every other Wednesday, so that I am not working more than four days a week and said that he would increase that number if needed, Currently, I am already off every other Friday. With my workload, I felt like I should not take off more than the one day a week except for days that I was in severe pain or just not able to come in. I have suffered sleep deprivation, extreme stress and emotional distress, as a result of the harassment taking place against me since I have been in my position, There were several days that I have sat in my car and cried before entering the office, not knowing what harassment I would have to face from Amy and Gustavo that day. I have many times spent a large portion of most lunch hours crying and praying before coming back into the office. There are many times that I have had to close my office door, because I broke down at work emotionally and did not want Amy or other co-workers to see me crying or know that the stress affected me. I have never let on to any of my co-workers the stress that the work environment has taken on me. I have cried profusely several nights knowing that I had to go back to work in the morning to such a hostile work environment again. Since the obvious signs of replacing me have been apparent, I usually work through the stress so that Amy can't say that my work is falling behind or find another excuse to give my job duties away.

9/26/2013, my first day back in the office since my automobile accident, Amy came into my office to talk to me about the accident and my injuries. I told her that I had fractured ribs and misplaced bones. I also told her that I was on a lot of heavy medication and was seeing a Chiropractor; I told her that I was in a lot of pain and might not be able to make it all day at work. She asked me what kind of accident, where it was and other details. I answered her questions. After telling Amy that my accident was classified as a "T-Bone" accident, she proceeded to tell me that she was in the same type of accident, but was hit by a semi truck and walked away with no injuries. **She then proceeded to tell me at least two to three times during our conversation that she could not understand how**

I was hurt when we had the same type of accident and she was not. If that wasn't bad enough, she also told me that "you know chiropractors are not real doctors, right?" She then proceeded to laugh. I told her that I've never heard that. She proceeded to tell me that "No, they are not real doctors, they can't prescribe any medicine." I was deeply offended as I now had to contend with another form of harassment; sarcasm regarding a major injury!

9/26/2013 – Up to this point, since being made to report to Gustavo, I had noticed on several occasions, intimidating behavior on his part. 1) Gustavo would question me about comp time. I was told that he hates comp time, by Amy and that he does not want any of us earning any. **12/16/2013** (most recent time Amy made this comment) I am usually the second one to arrive to the office. Amy comes in at 7:00 and I come in at 7:30. I am also usually the last one to leave the office, with the exception of Lisa U, there are times that we leave around the same time, or she leaves shortly after me, since she comes in later in the morning. What I noticed was, that Gustavo most times leaves right at 5:00 or shortly before. He very seldom stays late unless he is assisting with the annual picnic and annual benefits enrollment that I know of. However, most always Gustavo would have left for the evening and I would leave much later after him, but for some reason his car would still be on the lot after I left the building. I thought it strange to see his car still there so late after closing. (He parks closer to the front door, so it is very visible when leaving). I park out of the way on the far left side, out of view unless you turn to look that way. On occasion, though I would think he has left for the evening, his car would still be there. So, a few times, I decided to get in my car and not pull off right away and sit to see if he would come out. To my amazement, shortly afterward I would see Gustavo coming out of the building and look over towards my car. I felt like he has been watching me to see what time I actually left for the evening to verify my time. This may be a big co-incidence, but the office closes at 5:00 and there would be no reason for Gustavo to still be in the building at 5:30, 6:00, etc., Now that I have come back to work from the accident and will be on FML, I no longer have observed Gustavo staying late and signs of him watching me leave the office. However, he has made more vocal his discontent with me earning any comp tome. (See **12/19/2013** notes).

I was placed on Family Medical Leave as a result of my accident and am still on Intermittent Family Medical leave today. From the day that I returned to work after the accident, Amy either came to my office or called me into her office to talk about HR related subjects and would constantly harass me by telling me that Chiropractors are not real doctors and that she can't believe that we had the same type of accident, It became exhausting to continually defend my injuries to her.

09/30/2013 – I went into Amy's office to ask her an FML question. She answered my question then asked me about the medicine I was taking. I told her that it was strong medicine and without it, I would not be able to work. She proceeded to compare our car accidents again and tell me as she had several times by now, that she still could not believe that we had the same accident and that she was not injured and that I was. I told her again that I don't have an explanation for her accident, but that I have very painful

injuries, with x-rays and C-T scans showing them. To my complete surprise, she escalated her previous patterns of harassment by telling me that my car didn't even look damaged. I could not believe that she would make a comment on my car. I told her that the bumper is cracked and that I have it wired up with clothes hangers to hold it in place until it is repaired. I could not understand why she would or would have someone spy on and inspect my car when I didn't even think she knew what kind of car I drive. I have never told her what I drive, or the color of the car. She has never ridden in my car and she parks in a completely different parking lot on the other side of the building. My car is not even visible from her office windows or her parking spot, until the beginning of 2014, when they tore down the building that blocked the view between the lot she parked on and the lot where I parked. I also owned more than one car at the time, so she wouldn't know what I was driving unless she was watching me or had someone watching me and inspected my car. I feel that this constant harassment is a direct result of my decision to exercise my right to Family Medical Leave Act.

On **10/01/2013** – An employee in another department of the county sent an unfavorable email to me and copied her manager, who is a Judge, along with my Director Amy Phillips, stating that I made comments that I did not make. Immediately I addressed the email and stated what really took place during our phone call to tell my side of what actually was discussed. She then responded with more lies. After several emails, I responded that it was not a good use of the County's resources for us to continue going back and forth in email. After Commissioners Court that day, Amy returned to the office and called me into her office to have a conversation about the phone call. She stated that I was defending myself and it might ruin her relationship with the judge. I stated to her that it is the right of anyone to "defend" themselves if someone is making false accusations and copying their manager. I re-iterated that if I didn't respond then the addressees of the email would take it that what the employee was stating must be true and that I also wanted a paper trail showing what happened, so there would be no questions if this ever came up again. I don't understand why Amy would think that I should not tell my side of what happened.

Amy told me that I should have called her instead of email. Again, I could not see why she felt I should call someone that is accusing me of something untrue and not respond in email **so that everything is documented**. She also mentioned that it was not my job to watch Commissioners Court, yet both she and the former Assistant Director told me that I needed to watch Commissioners Court every week to ensure that the order makers are approved and that to watch for anything else that I might need to write up Green sheets on.

On **10/02/2013**, Amy sent me a "Verbal Reprimand Notice"; I was in shock as I have never received any type of reprimand in my entire professional career. **She iterated to me in her email that it was not going to be made a part of my personnel file and that it was only for her records and that no one would know about it.** I told her that I still wanted my letter to always accompany it wherever it goes because it was not warranted. To this date there are no complaints, reprimands or anything negative in my personnel file and I expect it to stay that way.

10/07/2013 – Meet with Commissioner Coleman that evening. **(See email exchange attachment)** I told the Commissioner about my earlier conversation with his friend Attorney John Hagan at the symposium.

I asked if the attorney had called him yet to tell him of the conversation and he stated that he had not. I told him that I wanted to make sure that it was known that I had already stated that there was discrimination/Harassment taking place in my department, at the hands of the Director Amy Phillips. I told him that it has been going on for quite some time and that I had let it go without coming forward to them in the past and that I felt like Amy and Gustavo would team up on me on things. I told him that since recently we just implemented “Civil Service” and asked him if that where I now would have to go to file a complaint. He told me that he was not absolutely sure, but that he thought it would either be Civil Service or that I could bring my complaint to the Commissioners since Amy reports to all of them, along with the County Judge. He asked me if I wanted to share with him what was going on and I told him that I didn’t want to go into detail at that time as I knew that it was a big complaint and that there would be a backlash. I also mentioned that I was in a car accident the day after talking with Attorney John Hagan and that I didn’t have the physical energy to go through with the complaint at the moment and that I also needed to discuss if I wanted to pursue it with my husband first before proceeding. He was very understanding and respectful and told me that if I changed my mind and felt more comfortable talking to more than one Commissioner that he could arrange it. I told him that I still needed to think about it and would let him know. He also told me that he felt obligated to at least tell one of the Commissioners that I’d talked with him about a possible forthcoming complaint and I told him that I understood.

10/07/13 – Responded to Amy’s reprimand and stated that I wanted my response to be kept with her reprimand, even though she treated it as not a real reprimand, only verbal and kept re-iterating that it wasn’t going in my file. She told me that she couldn’t believe that I sent her a five page response, as no one has ever responded to a verbal reprimand and that she told me that it wasn’t going anywhere and would not be placed in my file.

10/07/2013 – I went into Amy’s office to hand her the papers. Amy, didn’t even look at the papers, she took them from me set them on her desk and then **proceeded to read aloud a complaint that she was reviewing, from an employee in the District Clerks office by the name of “Adam Thompson”**. While reading the complaint, she would make faces, gestures, shake her head, and make negative comments about him without even knowing anything about him yet. **She told me that he sounded very “suspicious”**. **She summarized that he was filing a discrimination complaint**. She then asked me if I knew him, as she does anytime she talks to me about black employees. I responded that I did not. She proceeded to read aloud several paragraphs from the employee’s complaint and commented on how articulate he is, which is also typical of what she says when the employee is black and speaks or writes well. However, **she has never made that comment about a white employee to me, as if being articulate was the norm for white employees, but not blacks**. When she said “articulate” it was another indication to me that the employee must be black. As she continued reading the complaint, she read a statement that clearly indicates the race of the employee, as he states his race in one of the later statements she read. She then looked him up in the directory to look at this

picture and birth date. Amy pointed out several things in Adam's complaint that she did not agree with, believe, and questioned and wanted to see if I agreed with her along the way. This was a tactic Amy has attempted to use numerous times in the past. **Several times she would read comments and mock him, as if the complaint was a complete joke to her, at times she would laugh out loud.** I was extremely uncomfortable, to discuss the complaint on yet another black person, as I knew that no matter what I said, her goal was only for me to hear her degrade, discredit and offend yet another black employee and there was not much I could do but be subjected to having to endure her harassing me again through this process. I was forced to hear comments that I interpreted as "racist" and again endure a workplace and environment of harassment. After looking at his picture, she started judging the way he looked and stated that he was over thirty and only working part time.

After she saw that I was not going to agree with her and was highly offended by her comments. Amy also told me that Adam stated in his complaint that some of the incidents he was complained about, occurred over three and a half years ago, Amy indicated that he must be lying since he waited this long to complain. She asked me "don't you think?" I stated that it might be considered odd that he waited this long, but that it didn't mean that the incidents did not happen and that there was no validity to his complaint. I stated that he must have had reasons for not speaking up before now. **Amy then stated that "I get so tired of people bringing bogus discrimination complaints to me just because they were reprimanded.** Unfortunately, this is a comment I have heard her make numerous times before. By the end of the conversation that morning, it was obvious that she had concluded that she would not believe his complaint to be valid, as she has on other occasions in the past regarding black employee's, even before any investigation are conducted. She stated that his complaint was obviously submitted because he was reprimanded. I stood in front of her desk in disbelief that she would bring up this topic to me. Especially given the long response I just sent her the night before responding to her earlier unwarranted verbal reprimand. Again, **I was put in another familiar position where she was not happy with me for disagreeing with her and upset that she could not intimidate me into agreeing with her that his complaint was bogus.** As I left the office, she asked me to look up his application and give it to her, so that she could look at his work history and education because she said that he sounded "educated".

After lunch that same day, **Amy called me from her cell phone and told me that she looked up Adam's benefit information and found that his emergency contact was a man. I thought that it was an invasion of the man's privacy to go so far out of the way to try and find something negative on him.**

She then stated to me that "he must be gay" because "what grown man would list another man as his emergency contact instead of a woman. I was extremely offended by that comment as I was well aware of the legal implications of discriminating against workers based on sexual preference. I also felt that Amy had once again subjected me to a workplace of discrimination and harassment by that one statement alone! Before ending the conversation, she then told me about another employee in the Sheriff's office. **She told me that he was also black** and that he had been reprimanded several times for being late to briefings. She told me that the employee brought his concerns to her in a complaint, but that he was only complaining because of the reprimand. Amy re-iterated

the same offensive comment she made to me earlier that same day, she re-stated that she was “sick of people bringing discrimination complaints to her just because they had been reprimanded and that she would be dismissing his claim. For some reason, Amy thinks it’s acceptable for her to subject me to these offensive comments about black employees on a regular basis, with no regard for my own race, just because I work in Human Resources. Amy interfered with the outcome of this investigation before she even started the process by performing unbelievably unethical, bias, prejudice and illegal acts. She also made the racist, improper, unprofessional comments while reading his complaint to me and subjected me again to having to listen to her make fun of the man, demean his character, call him a liar before even getting started, concluding he was gay and finally complaining to me about blacks making complaints in general. As a result, I am afraid that many investigations on behalf of blacks over her 16+ year tenure have been fixed so that blacks could not possibly have been given a fair investigation. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would subject me to hearing her making fun of black employees complaints and decide that they are only a result of a reprimand, go out of her way to find anything she can to discredit and demean their character and interfere with the outcome of the investigations by compromising the outcome through ensuring that she controls the result to be not favorable to the blacks, when her job as the Director is to treat the black employees with the same respect, fairness and objectivity as white employees.**

10/10/2013 - Later that same evening, I begin updating a long letter to Amy that I was going to send her to tell her in writing how I felt about the environment of harassment that she was putting me through, since I arrived in my position. (My computer records will show that this letter was last modified on 10/08, 10/09 and lastly on 10/10). However, oddly enough, only days after my conversation with Commissioner Coleman (see below), Amy comes into my office before leaving for the day, sits down, interrupts me from doing my work and begins to ask me about my injuries and asks me how I am feeling, as if she is actually concerned, no longer comparing my accident to hers and no longer telling me that Chiropractors are not real doctors. She suddenly is acting as though she believes I have injuries. She immediately stops questioning my injuries and doctor and pretends to believe I am in pain. I have to wonder if she somehow was told about my meeting with Commissioner Coleman and the possibility of a forthcoming complaint.

10/11/2013 – Michelle had an over three hour closed door meeting with Frances Knott. She is a former Chief District Clerk that was recently fired from her position. I left the office at 5:30 and Michelle and Frances were still meeting. There were several Professionals and Non professionals that witnessed Frances Knott having the long meeting with Michelle. (See **10/21/2013** notes for relevance)

10/16/2013 – What a big mistake not to send her the letter, **by this date Amy was back to her old tactics again.** She and Gustavo wanted to meet with me regarding Nancy Salina’s FML paperwork on an employee that we appeared to not have the proper documentation on. **The meeting quickly turned into a harassment interrogation.** I felt like I was in an actual police interrogation. Amy was very intimidating during the

meeting, as she always is when she meets with me and I don't agree with her. She displayed many intimidating antics, and gestures **pounding her fists on the table, rolling her eyes, shaking her head, starring me down, throwing her hands up, making frustration sounds, and the usual harassing conduct she displays when meetings with me don't go her way.** I was afraid that she was going to get extremely irate, as she was turning red and was extremely upset that she could not get me to agree that I had done anything wrong. During her interrogation, she took a lot of notes, as she tends to do anytime she has a closed door meeting with me on an unfavorable topic. **I begin to fear that she was actually going to completely lose it,** so I turned one of the emails that I printed off and started taking my own notes. This made Amy even more upset and she soon ended the meeting, by standing up leaning over the table and telling me that she wants copies of all of my the papers. I told her that I would give her copies of the emails, but that I wrote my own personal notes on one of the papers, so I would keep that one and reprint the email for her without my notes. She looked at me with disgust and **intimidation** and demanded that I give her everything and actually said "I want your notes too". I paused in disbelief, as I couldn't believe she was demanding my own personal notes. I knew this was unethical, but I felt that she was so emotionally unstable and angry at this point, that **I actually feared for my safety,** even though Gustavo was in the meeting also. So, I began gathering everything I had and handed everything to her. She then said "would you like a copy of mine". I didn't know what to say, as I was still in shock, so I said sure. She opened the door, left the room and went to make copies. **(See Amy's notes attachment)**

10/16/2013 – Amy made her usual comments about Nadiya being a liar and a troublemaker and made fun of her needing color coded folders to perform her work, which sadly for Nadiya is a condition of her Family Medical Leave from what Amy tells me. It's hurtful and harassing to me to have to constantly be subjected to hearing Amy make a joke of this woman's unfortunate medical condition. Amy seems to not be able to let go of the fact that Nadiya won her discrimination case and uses every opportunity she can to remind me of her views of the case and continues to tell me that they are appealing it and hope to get the decision overturned. Disregarding over and over my wishes to not hear or discuss Nayda's case. (See details on Nadiya below).

10/17/2013 - Keep in mind that this was the day after she stood over the desk in her office and demanded my notes from her interrogation of me. I felt like she was very aware that after she had committed yet another harassing act, that she knew that she had messed up once again and possibly wanted to try and make it right by not actually apologizing, but appearing to show some concern. Strangely, out of no where, Amy started telling me about possible financial difficult due to her mother in law's illness. By this time, I wondered if she had either read the draft of the letter I was about to give her or if somehow she was told that I met with Commissioner Coleman and was hoping that I would not pursue my complaint, if she could get me to feel sorry for her. My initial plans were to send her the letter that night before I left and proceed with meeting with the Commissioners. Because of my continued thoughts of a possible backlash, I decided not to send the letter. As of now, the letter is still saved on my office computer, but was never given to her.

10/18/2013 – My mother has a massive heart attack and now I am nursing her and dealing with my own Family Medical Leave, in addition to being harassed about my accident injuries by Amy. I’m finding myself having to close my door and take multiple breaks as **the stress of the work environment is extremely difficult to deal with when I’m already on a lot of medication and still in pain.**

10/21/2013 – I spoke with Lisa today and she told me that she was upset at how the investigation was being handled on Adam Johnson’s (District Clerk’s Office) complaint. She told me that Adam’s case was “doomed before the investigation even started”. I asked her why and she told me that Gustavo and Amy assigned Michelle to work on the case with Lisa Uhlich, our Civil Service Coordinator. I asked Lisa how Michelle could be sent to investigate a complaint and interview an employee that she has already talked to for over three hours before the investigation begins. **(See 10/11/2013 notes) We both agreed that the investigation is already compromised and fixed to be disregarded, given the prior meeting with Frances.** There was no way for Michelle to be impartial. In addition to that issue, Lisa proceeded to tell me that she was also upset because she couldn’t believe that Amy and Gustavo would assign Michelle when she had never done any investigations to her knowledge. Lisa proceeded to tell me that Amy attacked Adam’s character with demeaning remarks about him before Lisa even talked to him, when she told her about the complaint. Lisa also stated that Michelle quoted things to her that Amy told her about Adam and that Lisa had to correct Michelle as **she had already turned the complaint around to convict the complainant based on information feed to her by Amy and what she had already concluded based on her conversation with Frances Knott.** Adam Johnson is the same black employee that Amy said several negative things to me about in her office on 10/07. The same man that Amy concluded was a liar because he waited three years to bring his complaint and that he must be gay since his contact person is another man. (See 10/07 notes above). Lisa went on to state that Michelle was useless during the investigation, as she continued to say negative, belittling comments about him during the drive over to the office, when they drove over to investigate and that you could tell that a lot of it was repeating comments that Amy made to Lisa about Adam. She stated that during the investigation Michelle would ask questions that were not fair and also attempted to lead him into the answers by giving him multiple choice questions and tried to lead him into the answers instead of letting him answer on his own. Lisa stated that there was no way for Michelle to be impartial and judge fairly in this investigation giving all that she already knew and was told by Amy and Frances Knott.

12/03/2013 – Lisa and I were talking about the current sexual harassment investigation we are working on together. During the conversation **Lisa bought up the previously botched investigation for Adam Johnson’s complaint and how she is still upset at how Amy and Gustavo handled the complaint by assigning Michelle to investigate it and interfering with the outcome, by attempting to sway her and Michelle’s opinion of Adam before they even interviewed him.** She told me that Amy was “almost violent in her approach”, “she sort of turned hostile” and completely ran Adam’s character down and was emphatic about Adam being a liar.

12/05/2013 - Amy made the same usual comments about Nadiya being a liar and a troublemaker. Lisa witnessed these comments; as we were discussing another investigation, Amy asked Lisa to come in and ended the conversation by bring up Nadiya's case, yet again. (See details on Nadiya below)

12/09/2013 – Sometime early during this week, Gustavo called me and told me that he wanted FMLA paperwork from my physician because we needed recertification and it had been 30 day. I told him that because my doctor just provided an update requesting that I take off every other Wednesday and that I showed Gustavo the form, I didn't have anything else to give him. I told him that my status hadn't changed in the last two weeks and that the form I showed him from the doctor requested the change of schedule through the end of year. Gustavo said, "yeah but, I don't know" which is what he says quite often, "we need recertification every thirty days". I told him that I didn't think that was right and asked him was that in the policy? (**see attachment #5**) Sounding obviously like he didn't really know what the policy read, but though that I would be intimidated into providing one anyway, he ended the conversation, by saying I still think we need an update. **Note:**

I am on FML Intermittent leave, not continuous.

Between him and Amy harassing me about my FML, I was very disturbed and felt threatened that I was being treated unfairly again and that there was no policy or justification for him asking me for an update, when I just provided the office with a couple of weeks prior, and the update is in my file. (**See the County's FMLA policy, Designation form #6, Eligibility letter attachment #7**).

12/11/2013 – Amy came into my office and started talking to me about the sexual harassment case that Lisa and I were working on and how the claimant wanted to call the investigation off. Amy felt that this somehow was a good time to bring up Nadiya's case again, even after I have told her several times in the past that I had no comment on Nayda, knowing that we didn't agree that the racist comments she filed the complain on would have been offensive to me also. Amy disregarded my feeling, yet again and started telling again how it was extremely hard to prove discrimination and stated that "even if you do file, it's not worth it." She told me that "your life is miserable, because you still have to work in that environment after you have sued your job with everyone knowing you filed". By this time, Lisa walked by my office and Amy called her in and continued re-iterating that filing a complaint is not worth it. By the time Lisa was in, Amy stated that you end up with all kinds of issues and then said, just look at Nadiya, she is such a liar and I wouldn't want her representing me.

12/16/2013 – I worked on an "Agenda placement" for our district attorneys office. A part of the process includes obtaining supporting documentation to be included with the submission. One of the documents needed is a "Budget Impact statement". This document is provided by the Budget office and was completed by our Budget Officer, then submitted to me and others on the email distribution. After I created a draft of the "placement", I go to Amy for approval. She normally wants me to bring her a hard copy so that she can make changes if she wanted to re-word any part of it. I then take the draft

with her changes, revise the placement and submit it for approval. This process has to be completed by a certain time of day. On this particular day, the cutoff time was moved up. I was working on the draft and knew that I needed for Amy to look at the draft. I noticed Gustavo had gone into her office and they were meeting. I'd hoped they would be done by the time I needed her to view my draft, but they were not. I knocked on the door, apologized for interrupting and reminded Amy that we needed to get the placement in within the hour. She told me no problem and started to look it over in front of Gustavo, as she begin looking at it, she make updates which is typical. But, what wasn't typical was what came next: I happened to have a copy of the "Budget Impact" statement attached to the draft, so Amy was done with her review and decided that she wanted to look at the Budget offices numbers.

I thought it was strange, but didn't expect any comments on it seeing that our office is not responsible for the numbers, but the Budget office is. She then starts to complain to me that the font was smaller that it could be and then asked me did I verify the numbers. I told her that I did not, as I have never verified their numbers in the past. I told her that we have to be able to depend on the Officer (equivalent to the Director of Budget to submit accurate information. Amy then got very upset as she started acting out as she has so many times in the past with antics where she throws her hands up, shakes her head, pounds on the desk, and starts to get very irate, as she stares at me and says how many times have I told you that we are responsible for every document that we send even if it comes from another department, we should be verifying their numbers. I was in shock even though she is known for getting irate and attempting to intimidate me countless times in the past, this was the first time that she was going off over a Budget Impact statement. I have done several placements in the past with the same document type of Impact statement attached and she has never once questioned me about the validity of the statement coming from Budget, because she knows that I can't verify it. She has told me one time before when she questioned Donna (Budget Officer on one, but never me, seeing that it is not my job. I could believe that she was behaving like this. I knew like every other conversation I've ever had with Amy, it doesn't matter what I say. Her goal has been and will always be as long as I am in the department to intimidate me so much that I would just get frustrated enough to resign. She started to ask Gustavo if it looked right to him and he made a comment about glasses. But she tore into me about the document for no reason at all. I stood in unbelief over her actions and eventually she told me to just send it. I left the office, with the same feeling that I do most times I leave her office. There was absolutely no reason for her to get hostile over a document that she knows we can't verify. As I took the document back to my office, I closed my office door behind me and took a few minutes to take a break and pray that I could make it through today and the next day without her harassing me any further, so that I could be on vacation and submit my complaint. Shortly after I opened my door, I received and email from Gustavo, as he had left Amy's office by the time I opened my door. The email stated that he wanted to talk to Cassie and I regarding training the next morning. After submitting the placement, I left the office to go to my physical therapy doctor's appointment.

12/17/2013 – I’VE ALMOST MADE IT! This is the last day before my vacation. I am drained mentally by the unethical environment I am working in. My only hope is to make it through the day without having to endure any more intimidation or harassment on Amy or Gustavo’s part. I am scheduled to leave by 8:45 to meet Lisa in Carrollton to work on an investigation. Before leaving I go to the meeting. In the meeting Gustavo asks about the training in the NEOGOV system. I tell him that I have already trained Cassie. He then mentions other areas of training that are job responsibilities that I was not made aware of that he and Amy were giving away of mine. I was very uneasy that they were making me share more of my job responsibilities. I guess I should not have been surprised given their track record and the fact that it was very obvious why Amy insisted on hiring Cassie, as she was picked to be my replacement. I got very quiet in the meeting when he stated additional responsibilities that he wanted me to train Cassie on. There was obviously tension in the room as Cassie innocently did not know what was going on and I was caught off guard that He and Amy would pull this on my last day before vacation. Michelle was also present in the meeting and was fully aware of Amy and Gustavo’s plan, as Cassie and Michelle left the room. Gustavo and I stayed behind to discuss his revelations. He told me that he could see that something was bothering me, I told him that I didn’t think it was fair that they were yet again, giving away and making me share my job responsibilities. Gustavo mentioned that it was a way to make it fair so that I would not have to put in any comp time. I told him that no one told me about the move and he adamantly stated that Amy told me about it. I told him that she had not and that she only told me that she was giving the screening process for the Administrative jobs to Cassie. He told me that Amy told him that I knew of all of the changes. We ended the meeting by him admitting that he hated comp time and that he did not want me putting in any more. I explained that it was not fair that I would be restricted to not putting in comp time, when necessary. Because if I don’t get my work done there will be complaints, however, there would be times where I had not choice but to put in extra time to get the heavier workload done as any employee would. He ended by saying that he didn’t know how I was not aware of the changes that they planned for my job responsibilities and that the additional tasks were all linked to the one job responsibility. After the meeting I went to my office and as I was working, later that afternoon Amy come into my office and closed the door and told me that Gustavo told her that I was unhappy with the changes. I told her that I was not understanding why they were taking more of my job duties away. She told me that they were concerned about comp time. I told her as I have several times in the past, that given all that my job entails, it was normal to have comp time every now and then and that it was not like I was building up a lot of time, at no more 1-3 hours every so many pay periods or so. I reminded her of the fluctuation in # of applications, FML calls and paperwork and large amount of surveys during Budget time, that demands that I put in extra time, during those periods. I reminded her that it had nothing to do with managing a workload, only that I was committed to getting work done, even it meant occasionally putting in comp time. I also told her that She, Gustavo and Michelle also put in extra time during open enrollment and picnic times, demanding that they also earn comp time, but was no reflection on not being able to manage their workload. She told me that I should have known about the changes and that those were her plans all along for Cassie’s position. I told her that it did not matter what I thought or how I felt, the decision was not mine. I felt I was caught off

guard again and that no one came to me about a concern with comp time, but instead they she decides to make me share my job responsibilities with yet another co-worker. I told her that no other professional in our department has to share their job responsibilities. Everyone is an expert in their field and is responsible for their own task, except for the case of having a backup, but I was the only one that was treated differently. Amy continued to try to dismiss my comment by stating that they are just trying to help me. I told her that Gustavo hates comp time and she agreed. Note: She then told me that just wanted me to find a way to eliminate my comp time, or that she was "afraid that Gustavo will take your flex day away." I am the only one in the department being forced to share their job responsibilities, First with Lisa and now with Cassie. At the end of the day, this is yet another act of discrimination, in that I am being treated differently from everyone else and Amy and Gustavo are trying to hide the act and mask it as a workload issue. As of week of **12//23/2013**, please see the comp time hours that Amy, Gustavo and Michelle have accumulated.

Amy - has 527.30 "Grandfathered" comp time hours, plus 137.45 regular comp time hours, for a total of **664.75 comp time hours**.

Gustavo = has 164 grandfathered comp time hours, plus 63.45 regular comp time hours, for a total of **226.45 comp time hours**.

Michelle - has 298 "Grandfathered" comp time hours, plus 117.15 regular comp time hours, for a total of **415.15 comp time hours**.

(My comp time hours as of this same date however, was less than 30 hours and I have not been with the county long enough to have grandfathered hours).

12/17/2013 – Amy left my office after the comment about Gustavo wanted to take my flex day away. I knew that this is really what his frustration is about, he does not like for anyone but himself, Amy and Michelle to earn comp time and that also hates the fact that I have a "flex" day every other week and has been looking for a reason to take it away and have the action justified since I started reporting to him. So far, he has not found one. Minutes after Amy left my office, she came back to my office and told me to have a good vacation and then said, "by the way, I want to apologize for getting so upset yesterday with you when you came into my office. I should not have done that I was not mad at you, just frustrated, but I was wrong for taking it out on you. "I responded, "Ok", and continued working. This was not about one instance. I have endured Amy's intimidation, hostility and discrimination for going on three years and I think it's time that she is held accountable for breaking federal laws. She should be held to higher standards, instead she breaks the very laws she is responsible for ensuring the county upholds.

12/17/2013 – Just before I left for the day, I saw Cassie in the hallway. She told that she hoped I would have a nice vacation. I told her thanks, wished her a merry Christmas and then complimented her on her hairstyle. Cassie then shocked me when told me of a comment that Amy made to her in front of Leslie that was very disturbing. She told me that she was at the front desk and was walking by Amy when Amy said to her “Gustavo says that’s not your hair”. Cassie told me that she was so embarrassed and angry at the same time, that the Director of Human Resources would make such a belittling comment to her and if it’s not bad enough, she made it in front of her co-worker, who is supposed to report to her. She said that Leslie was so embarrassed for her that she didn’t know what to say and just “kind of” walked away. She then told me that she responded “tell Gustavo to stay out of my business”. She told me that she was so afraid that she might be fired for making that comment, since she is still on probation, but that she was so hurt and shocked, that for that moment she didn’t care if she did at that point. She stated that she really needs her job, but that she doesn’t believe that Amy would dare make a comment like that about a white employee. Though it surprised me that Amy was careless enough to make such a harassing comment in front of someone else where it could be verified that she said it, it did not surprise me that Amy made the comment about a black employee. These were the type of shocking comments, I’ve have to endure from Amy since I entered my office. There is a long pattern of her making countless racial, demeaning, offensives, harassing comments to me over the years and I have been taking notes since then. The only difference now is that there are finally many others that heard them. I see that she has already started harassing Cassie to see just how far she can go with her before she speaks up. The county is risking a great deal by having this racist Director represent them, as she constantly violates federal harassment laws and county harassment policies.

Since I have been in this department I have constantly been subjected to hearing negative comments about blacks on a regular basis. Saul Moore, Robert Musgrove, Vanessa, Sandi Wiggins, Cassandra Berry, Nadiya, and Tracy Madison. It has been highly disturbing and offensive for me to be subjected to these offensive comments at any given point and time and continue working in this offensive work environment, under the intimidation of a **director that is constantly violating the very policies and Federal Laws of which she is responsible for holding the employees of the county to.**

On or about - 06/04/2011, 02/07/2012, 11/12/2012, 05/30/2013, 8/07/2013

Saul Moore– Since I first started in my current position, Amy told me about this ex-employee and how incompetent, dumb, lazy and illiterate he was among other choice words. She stated that he tried to represent himself but was too dumb to know what to do after firing his employee. Amy says that Saul was in a position that he never should have been put in and that he was so dumb that he could not even write a full sentence. She stated that his wife did all of his writing for him and that he failed miserably at his position and then tried to sue us to get his job back, but was so dumb that he could not handle himself without his wife who has a Human Resources background. To this day, at anytime Amy will bring up his incompetence to me during any conversation. Amy told me that he lost his grievance case and that the only way he kept his job as long as he had was because he was black and they were afraid to fire him. Here comments are highly

offensive and constantly reminds me of how negatively views black employees and subjects me to having to hear listen to her offend my race on a consistent basis. Amy asked me if I knew him, even though from what I understand he was fired long before I was even hired. I have never conversed with him that I know of.

Below are the names of county employees, ex employee and job applicants that Amy has made several derogatory comments about and have attempted to intimidate me into not even pursuing any claim of harassment because of what may have happened to them.

Robert Musgrove– This employee is works in our Public Works department. **Amy has told me that he is educated, but very dumb, sneaky, lazy, dumb and can't be trusted.** She says that he runs to Commissioner Bobbie Mitchell each time he doesn't like something and that Commissioner Bobbie Mitchell protects him, just because he is black. She says that the department is afraid to write him up because they are afraid of a lawsuit. Amy proceeded to tell me that she thinks he is lazy and doesn't really work. That no one can track what he really does and that he has too much freedom in his position and no accountability. She told me that he is so dumb that once received a ticket for going to fast in a construction zone and that you never know where he is at any given time and if he is really working or not. She has asked me if I knew him. I have never had any conversations with him other than answering a policy question on FML one time.

01/15 through 01/18/2013, Again on or about 9/18/2013 and again on 12/5/2013, Former Economic Director, Vanessa Sims – Amy told me that this ex-employee was very weird and refers to her as a “psycho”. She told me that was also incompetent and didn't know what she was doing in her position and failed horribly. She said that she had no business having her position and that she failed miserably at it in a short time. She painted her as a complete nutcase. Amy told me that Vanessa practiced voodoo and had some sort of fixtures all over her property that she used as a part of her voodoo practices. Amy told me **that “we try to give blacks a chance to be department heads, but they keep screwing up”**. By this time I was told about Vanessa Sim's so called incompetence on three different occasions. Amy has asked me if I knew Vanessa, I do not.

On or about, 10/23/2012 - Sandi Wiggins – Sandi is a black current employee that works in our Health Department and has a Master's degree. From what I have seen on her applications, she is highly educated and has held several high level positions. She has applied for numerous jobs at the county, mainly in Human Resources and is more than qualified for numerous jobs in our department that she was highly qualified for. **Amy told me several times that she would never hire her. When I asked why, she told me that she is bossy, rude, overbearing, sneaky and other descriptions.** I asked her if she ever worked with her and she told me that she did not, but that Gustavo had communications with her on something in the past and that he did not like her. I asked her “doesn't it look bad that you don't even interview and give her a chance”. Amy responds every time that she has no interest in ever interviewing her and that she would never let her in this department. Because of Amy's personal feelings towards her, she will never have a chance of getting in. Recently, I noticed that she no longer applies to jobs in

our department. Sandi's title is "Assistant Bioterrorism Coordinator"; she has applied for the Bioterrorism Coordinator position. Amy told me that she will never get that position, because the people who work below her would quit if she ever got the job. Amy asked me if I knew Sandi, I replied that I do not. I have never met or had a conversation with her, other maybe answering a policy question.

2/13/2012 and 11/14/2012 Cassandra Berry – This applicant has a Master's degree and has applied for two positions in our department. She has held very high positions in her career. She is more than qualified for any position in our department, but has only been interviewed once; after I asked Amy if she would at least give her an interview, even though there was many times that she was one of the most qualified for the posting. Each time she applied, I would ask Amy was she going to interview her, and she would tell me that she has no interest in her. Amy told me that she inquired about her past and found out through a former employee that she "ran a school in the ground" financially. I told Amy that she wouldn't be dealing with finances in any of the positions she applied for in our department. **After giving me several excuses for not wanting to interview her, Amy finally said that she would interview her "so that she can't file discrimination. After Amy decided to Hire Harry Green for the Civil Service coordinator position, Amy told me that the real reason she didn't want to hire Cassandra was that she was afraid that she will put her in the same position again that she was in with Tracy Madison."** She stated that she obviously knew too much about EEOC and her rights, because she had a lot of prior experience in the field and that if Amy wanted to get rid of her, she would be stuck with her. Amy asked me if I knew her and I told her that I attended a church that she attends and have seen her there a few times. I have had conversations with Cassandra a few times. All conversations have been very short, just to tell her about her interview time and two other times where she called me to ask me about the status of her application and one time when she asked me what should her subject be for her presentation interview. At which time, I responded that it could be a subject of her choice. I do not know her personally.

6/9/2011, 07/19/2012, 08/27/2013, 11/06/2013

Tracy Madison– Tracy is the former Staff development Coordinator.

Amy told me on numerous occasions, that she thought she was too smart for her own good. Amy told me that she was educated and that she and Amy disagreed a lot. She also told me that their relationship got so bad that she desperately wanted to fire her, but couldn't. **She told me that her main problem with her was that she challenged her too much and that "she had and EEOC background and knew too much about discrimination laws and might use that against her"**. I was in shock that she would admit that she would want an employee fired just because they knew their rights. I have never met or talked with Tracy.

Nadiya Boldware - Williams– (MOST RECENT OCCURENCES WERE **10/16/2013, 12/05/2013 and 12/11/2013**). Sometime late last year, Nadiya won a widely publicized discrimination lawsuit in Federal court that was advertised all over the Denton news. Amy has repeatedly told me that she doesn't see how Nadiya found the comments that were said to her by the attorney that was fired offensive/discrimination.

All through the complaint, from the time I started in my current position, up to now, I have been subjected to added harassment by Amy through constant negative comments about Nadiya's character, things she said in court and other employee's comments about her. **Amy constantly refers to Nadiya as a trouble maker and a liar and tells me that she doesn't think Nadiya can't be trusted and reminds me that even though she won, the case is under appeal.** Amy told me that she never thought Nadiya had a case at all and never thought that she could ever win. **"Amy also told me that the attorneys told Nadiya that they were sorry that the comment offended her, what more does she want? That should have been enough?"** Despite my telling Amy that I don't want to discuss it, she continues to throw out offensive comments like this on a regular basis. Amy's constantly makes known to me her personal opinion of Nadiya and other details of the case, of which I am not sure I can legally disclose at this time in this complaint. Amy continues to try to make me talk about Nadiya even after I have told her repeatedly that I would have done the same thing if I were discriminated against and that I don't think it's a good idea for her to talk to me about that particular case, since our assessment would never be the same and given the nature of the lawsuit. Despite my attempt to repeatedly end the conversations where I am subjected to these offensive conversations, Amy continues to bring up Nadiya's name to me. Last occurrence was last Thursday (12/11/2013), where Lisa was present. During this particular conversation, we started off discussing another investigation, but Amy found a way to throw in negative comments about Nadiya. Nadiya remains a current attorney in our DA's office and other developments have transpired in her situation lately that are again uncomfortable to discuss, but Amy jokes about her current health situation to me on a frequent basis, which I think is also illegal to make fun of someone on Family Medical Leave, because of their condition. She makes fun of her having to have color coded folders to do her work now, due to her current FML health condition. She tells me that she "wouldn't want anyone like that to be my attorney, would you?" "Especially after she sued the county" Amy says that "the only reason they are making an accommodation for her is because they are afraid of her since she filed the discrimination case. She always ends the comments by reminding me that "she is nothing but a troublemaker and a liar". Amy also asked me if I knew Nadiya. I have never met or talked with Nadiya. Amy has told me on several occasions that the comment made by Cary Piel to Nadiya Boldware Williams ("Round them all up and hang them from trees"), was not offensive. Though I have told Amy when I learned what the comment was that the comment was highly offensive to me and I would have done the same thing Nadiya did. I have also told Amy on numerous occasions that I do not want to talk about Nadiya's case as it offends me to know that she doesn't find anything wrong with a racist comment like that, she continues to harass me and try to talk to me about details of Nadiya's case, re-iterating that they were appealing the case. This harassment continued up to the date Amy was made aware of my filing of the EEOC complaint. If it wasn't harassment enough to have to endure long meetings where Amy spent hours demeaning Nadiya's character, Amy then started to offend me in talking about Nadiya's health issues. She made fun of Nadiya's condition and her need for accommodations. She stated that she would not want a lawyer that needed the accommodations Nadiya needs to represent her and expressed her anger that she had to approve Sick Pool time and accommodation paperwork for Nadiya after she sued the county. Amy's harassment continued in subjecting me to her bring up Nadiya's case and

health condition at any given time in the middle of meetings about work related issues, as a way of reminding me of her hatred for Nadiya and her victory in court. It wasn't until I returned from work after vacation and Amy's knowledge of my filing that I got relief from her harassing me about the discriminatory remark made by Cary Piel and she ceased from making negative comments about Nadiya. **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would state that a racist comment such as the one made and admitted to by Former DA's Office Attorney Cary Piel about black people is in any way acceptable.**

Discrimination through Threats – Amy also constantly used Naydia's discrimination case from her first conversation with me about Naydia to tell me how filing a discrimination case would only hurt the individual, in that they normally end up with miserable and have to suffer from health issues. She continued to state how everyone would hate the person and the work life would be made unbearable and that it was not worth any amount of \$ received in that most times there not even compensation. She went on to say that she would not want to return to work after suing the company she worked for. She used this scare tactic many times on me, I think in hopes that I would be afraid to ever disclose the harassment she was inflicting on me. . **It is highly offensive to me that Amy Phillips, as the Director of Human Resources, would attempt to intimidate me into being afraid to pursue my right to file an EEOC complaint.**

RETALIATION:

- 1) Retaliation through communication with co-workers in department**
- 3) Retaliation through prematurely publishing my name on Commissioners Court Agenda while still employed, which has never been done in the past**
- 4) Retaliation through using email communication to create a public record fabricating a false issue**
- 5) Retaliation through changing email process in attempt to create a false reason for reprimand**
- 6) Retaliation through invasion of privacy and physical threat**
- 7) Retaliation through creating a 1st written reprimand and falsifying events**
- 8) Retaliation through using co-worker to change work process to adversely affect my work**
- 9) Retaliation by composing emails through Assistant Director, in attempts to my eliminate day off**
- 11) Retaliation by withholding my own personnel file and refusing to give it to me, then asking another employee in department to make a copy with her false reprimand.**
- 13) 2nd Level Reprimand issues by Amy**
- 14) Retaliation by continuing to send me emails unrelated to work. In attempt to harass me further for getting her to admit that she is illegally withholding my personnel file.**
- 15) Further harassment through emails pretending to create another issue by bring up an over two moth old conversation as an assignment that she claims I have not yet done and that it was suddenly overdue. “self audit”.**
- 16) Completely taken over management of me in retaliation. Compare # of emails from my direct supervisor to # of emails from Amy.**

1/7/14 – Amy retaliated against me for filing my discrimination complaint with EEOC, by telling another black co-worker that I filed a discrimination complaint against her. Amy stated to my black co-worker, that I told the EEOC office that she “creates a hostile work environment for blacks”, in general. I was told that this meeting frightened the employee and made her very uncomfortable. I was also told that the employee did not know how to respond, since she was still on probation herself. The employee stated that

she told Amy that she was unaware of the complaint. Additionally, I was told that Amy told her “Don’t talk to anyone about it because if the complaint is leaked to the media, it will look bad”, I am told that this move also caused extreme stress on the employee, seeing that she is black and felt that she was being watched and could be fired if she showed any concern, for me. **I feel that Amy clearly retaliated against me just days after learning of the case, by talking to this co-worker about my complaint and that it was an effort to intimidate her into being afraid to ever come forward with any of her own concerns to EEOC. At the time, this employee was still on probation and she feared for her job, if she displayed any concern for me. I feel like this act by Amy, was clear retaliation through intimidation. This same employee was subsequently fired in February, before she had the chance to complete her probationary period.**

1/14/14 – An agenda placement item was entered, whereas the county published my name on the Commissioners Court Agenda, under Executive Session, “contemplated litigation”.

After extensive research, I found that **NO other current employees had their names published on the agenda while they are still employed with the county, unless they have filed an actual lawsuit against the county in District or Federal court.** At the time of this agenda publication, I had not even retained an attorney, but had only filed a complaint. Therefore, there was no court case at the time of the agenda placement and no one even knew if my complaint would even result in any further action on my part. **I feel like this move was not only premature, but was a clear example of retaliation on the County’s part for me filing a complaint with EEOC. As stated above, after going several years back and viewing a large number of Denton County Court agenda’s, I have yet to find where a mere complaint that had not been filed in court and was therefore not a lawsuit, was published as an agenda item by the county in the past. I would like proof that the county can provide that this same action had been done in the past to an employee that only had a complaint against the county. After further research in talking to employment law professionals and EEOC lawyers, I have been told that this would clearly be considered retaliation on the County’s part. As a result of this major retaliatory move, my safety, privacy and working environment is in even more jeopardized with the entire county and public being able to view my name on a complaint, rather than an actual court case.**

1/21/14 – The agenda item has been removed.

1/28/14 - Agenda – my name is published again with the same verbiage as on the earlier agenda. **(Repeat of 1/14 retaliation)**

1/27/14 – Amy attempts to create a customer service issue via email, in an attempt to retaliate, through creating a public record of something that does not exist. See emails. Bing Burton was already mentioned in my full complaint document as one who told Amy that I was highly ethical, of which Amy shared the compliment with me at the time. Bing, nor Amy has ever made any mention of there being a customer service issue in his department, therefore there was no improvement to make. When I brought this fact to Amy’s attention in my email response, her email tone changed and then ceased, as she

realized that it was apparent that the fabricated customer service issue never existed in the past. **I feel that her attempt to make one a customer service issue, after my EEOC complaint was another clear act of retaliation.**

01/30/14 – Amy retaliates through changing her email process in copying Gustavo on a placement email that she attempts to show that I missed entering and sending to her for approval. She has sent me several emails by this point after learning of the EEOC complaint, but has changed her process in copying Gustavo on emails where there might be an issue that she can document me making an error. **I feel that Amy retaliated by changing her normal email process again and attempting to create an issue that Gustavo is copied on to find reason to give me a reprimand. In the past she had not copied Gustavo on these same type of placement emails.**

01/30/14 – After a few email exchanges with Amy, pointing out her change in process and needing a break from her retaliation attempts, I sent my last email, closed my door, sat down in the chair under my back wall desk, turned to the wall and kneeled my head to pray about her behavior, as I often have done even leading up to filing my initial complaint. Before I could lift up my head, Amy invaded my privacy by rushing into my office unannounced and enraged without notice, she proceeded to physically threaten me as she charges at me while I am sitting at my desk cornered with no where to go, she hostilely tells me that my email was inappropriate, and that I was out of line responding to her like that, she continues her rampage pointing at me and waving her arms, she then stands over me and stomps her feet as she looks at me with disgust and tells me that I shouldn't get so angry that I slam my door. I sat there in shock thinking that she may actually snap out of rage and was obviously delusional as she stated that I was somehow upset when she was the one compromising my safety. She then turns and begins to walk out with her fists balled up. Though we both knew that my door was definitely not slammed and that I had no reason to be angry, I in my normal voice, told Amy before she departed that "you and I both know I did not slam my door and I don't have anything to be angry about, it appears that you are angry", as you rushed into my office and invaded my personal space. I reminded her that I didn't start the email chain, but that I am only responding to your emails. She told me "yes, you did and Gustavo heard it". Gustavo's office is down the hall and she rushed into my office right after I closed the door sat down and turn my back to the door. I was completely intimidated, threatened and frightened by her hostile, unexpected, unseemly actions. As a result of Amy's actions, I immediately called two Commissioners after she left my office. I spoke with Commissioner Bobbi Mitchell and informed her of my safety concerns. I documented what transpired and reiterated my safety concerns and sent them to the Commissioners through my attorney as instructed that evening. The email was sent to the Commissioners court the following day. Though visibly shaken and disturbed, I tried to continue to working, though it was extremely hard to focus as I didn't know what to expect from her next. Shortly afterwards, Amy sent me another email, I respond and the emails cease. (See attachments). This was not only a clear violation of my privacy. But, it was extremely shocking to see Amy's outrage result in an actual physical threat, in the workplace, during work hours, as she lost her ability to control her anger at me for filing the complaint coupled with the fact that I refuse to let her continue to send emails, in

attempt to publicly record fabricated issues, without responding. **This act of retaliation on Amy's part has been the most physical yet.**

02/03/14 – I received a written reprimand from Amy with numerous lies, attempting to completely change the events of her actions in my office. Though she was obviously angry with me for responding to her email, she attempted to state that I was the one, angry even though she barged into my office and I never even left my chair. **I feel that this is yet another clear act of retaliation, in a desperate attempt to tarnish my record by creating another issue, fabricating documentation and creating an actual written reprimand to go into my personnel file (public record), in hopes of damaging my ability to advance my career in the future.**

02/03/14 – I learn that one of the Administrative Specialists attempted to eliminate producing normally executed reports for me, after being told by Amy that I filed the EEOC complaint. I notice one of the reports not being produced and when I asked the employee, she had no excuse for me other than she suddenly thought I didn't need them any longer, even though she was told by Amy several months ago that she must supply me with this report on a daily basis. The other report she decided to stop producing as well. I was made aware that this Administrative Specialist was told by the Administrative Manager that she is not to change her process, but to continue producing the reports for me and she has been reluctant and expressed her disdain in having to continue giving me the report since learning of the complaint through Amy. **I feel like Amy has retaliated by influencing this employee to change her process in hopes of me missing critical information, that would otherwise be produced by these reports that have been supplied to me in the past, up to the timing and learning of my EEOC complaint.**

02/04/14 – Early in the morning, I sent an email to the Assistant Director, Gustavo Hernandez, expressing my safety concerns (even though he is fully aware) and asking that my start time be change (from 7:30 to 8:00), on work days, to come in one half hour later or earlier, if another employee enters the department. This request was to avoid being in the office alone in the morning for a half an hour without any other employees present, in an effort to avoid starting the day alone with Amy Phillips, given her outrage over my EEOC complaint and in an attempt to avoid any further hostile outbursts by Ms. Phillips, that might result in my safety being jeopardized further with no other employees being able to witness her actions, or hear any noise from our offices. I copied two Commissioners on my email. Gustavo did not respond until 2/5. In his response, he copied Amy Phillips, but not the Commissioners. The email was clearly worded as though it was written by Amy and not Gustavo, as his writing skills are such that I have never seen any correspondence with him using such words and as a matter of fact have been asked by him what certain words even mean that were in the email. I believe that Amy wrote or helped him write the email to send to me and put her name on it. **I feel like Amy is retaliating by writing emails for Gustavo in an attempt to continue unnecessary communication with me and informally take over management of me from Gustavo. Emails can be provided to support this claim.**

2/13 and 2/14 – I exchanged emails with Amy asking her if I had a right to respond to written reprimands, as I wanted my response to be placed in my file with the reprimand that she noted would be filed. After several exchanges where she avoided my question and pretended not to understand what I was asking, she finally led me to the “Civil Service Rules” (see attachment of the rules), where I read for myself that I did have that right. The rules did not indicate that there was a response deadline or that there were limitations on what the response could entail. That same day, I went to look to see if my file was still being held in the file room and noticed that the file had been removed from the file room. I sent Amy an email to ask if she knew where it was and she admitted that she had removed it from the file room and refused to let me see the actual file, even though I requested to see it on 2/14 (12:07p.m.) She also stated that she would have someone make a “copy for my use”, instead of letting me view the actual file. I feel that this is not only clear retaliation that she removed my file from the file room and was holding it in her personal possession, as she had never held any other employees file in our department in her personal possession, but that it was defamation of character for her to let someone make a copy of my file when she had a reprimand in the file, per her statement telling me that it would be placed in the file. In addition, she admitted that she had no plans on returning my file to the file room with everyone else’s. **This was evident when she told me that she was going to remove all of the files for the HR employees and keep them in her office from now on. (See her email to the department).**

2/14/14 – The same day that Amy admitted to withholding my personnel file, Amy sent me another email, claiming to correct me on any past emails. My response, after the weekend was “God help you”, as I really felt like she needed spiritual intervention to help her cope with her outrage over my complaint. **I felt like there was no relief from Amy’s continued email harassment and retaliation of my complaint.**

2/19 – In further retaliation, Amy gives me a 2nd Level Reprimand, within a two week period of her “1st Written Reprimand and within two months of my EEOC complaint, Her reprimand is because of something she said she ASSUMED I was going to do, not any action that I performed. (Please see emails exchanges) Amy claimed that I attempted to actually place documents in my file, which was not only premature and outrageous, but not even possible if the file is not even accessible. Amy moved quickly in retaliating by issuing me a “2nd level Reprimand” based on her assumption of what she felt might happen. **She proceeds to harass me in an interrogation meeting about the reprimand and told me that she does not want me responding to all of her emails, as some of them do not require a response.**

2/25 – On the same day that I emailed and gave Amy written responses to both her 1st and 2nd reprimands, where I mentioned that the statements are untrue and that there were the result of my EEOC filing, she suddenly recalls an over two month old conversation and claims that I had not performed a task that she asked me to perform at that time. Not knowing at all, what she was even referring to, as I didn’t even know what a “self audit” was, Amy proceeded to babble on in her email and make disturbing accusations against

me one after the other, stating things that I did not do or say (See her 2/25) email. Finally, I was so tiered of the harassment that I sent her an email on 2/25 letting her know that her email was a personal attack. Amy sent me one last email and since that day I have seen any other indication of direct retaliation on her part.

FROM THE TIME AMY LEARNED OF MY COMPLAINT, TO 2/25, SHE HAD COMPLETELY TAKEN OVER MANAGEMENT OF ME. MY ACTUAL SUPERVISOR, GUSTAVO HERNANDEZ, HAD VERY LITTLE COMMUNICAITON WITH ME. MOST ALL EMAILS COME FROM AMY. EMAILS FROM AMY vs. EMAILS FROM GUSTAVO CLEARLY SHOWED THAT AMY HAD TAKEN OVER HIS ROLE IN MANAGING ME, UPON LEARNING OF MY COMPLAINT. HER EMAILS TO ME INCREAED SUBSTANTIALLY RIGHT AFTER HER LEARNING OF THE COMPLAIT. BOTH REPRIMANDS WERE GIVEN BY AMY. GUSTAVO SAT IN THE MEETINGS WITH LITTLE TO NOTHING TO SAY. MOST ALL COMMUNICATION LEADING UP TO THE REPRIMANDS, ALL CAME FROM AMY. MOST ALL OF THE FEW EMAILS FROM GUSTAVO, APPEARED TO BE WRITTEN BY AMY.

Though the atmosphere appears to be quiet again, since our last email exchange regarding the reprimand responses on 2/25/2014, this director is still in the position to continue breaking the law with actions of discrimination, harassment and defamation of character that have yet to be revealed. Since she is the biggest liability the county has, I would hope that the justice system take action to hold Denton County accountable for leaving a Director in a critical position such as hers, after learning of her illegal acts through the lawsuit.